



U.S. ENVIRONMENTAL PROTECTION AGENCY

## OFFICE OF INSPECTOR GENERAL

# **EPA Oversight: Unimplemented Inspector General and GAO Recommendations**

**Statement of Alan S. Larsen  
Counsel to the Inspector General  
U.S. Environmental Protection Agency**

**Subcommittee on Oversight and Investigations  
Committee on Energy and Commerce  
U.S. House of Representatives**

**September 6, 2017**



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Alan S. Larsen  
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Good morning Chairman Murphy, Ranking Member DeGette and members of the subcommittee.

I am Alan Larsen, Counsel to the Inspector General (IG) for the U.S. Environmental Protection Agency (EPA) and the U.S. Chemical Safety and Hazard Investigation Board. I would like to convey my appreciation to this committee for highlighting the importance of addressing unimplemented recommendations. Today I will provide you with an overview of some of the Office of Inspector General's (OIG's) recommendations to the EPA that remain unimplemented. As you know, making recommendations is a critical role for every OIG in carrying out our oversight mandate. Recommendations can result in substantial cost savings and major improvements in the efficiency and effectiveness of agency programs—but only when an agency chooses to implement them or if Congress chooses to take legislative action or other measures to address them.

**Background on Unimplemented Recommendations at the EPA**

The IG Act of 1978 provides for OIGs to conduct independent reviews of agency programs and operations. The EPA OIG's Offices of Audit and Program Evaluation perform the majority of their work in accordance with generally accepted government auditing standards (GAGAS). During the course of audits and program evaluations, the OIG analyzes the data on a specific

program, policy or procedure. Following comprehensive research and review, the OIG develops and issues recommendations as part of a final report. These audit and evaluation recommendations to the EPA—excluding those from any non-GAGAS projects—are the subject of my testimony. OIG investigative reports, which do not contain recommendations, will not be included in my presentation. However, I will be pleased to answer any questions you may have about completed investigations that involve EPA management matters.

The impact of an OIG recommendation may be direct cost savings for the EPA. Potential cost savings for the unimplemented recommendations listed in our most recent Semiannual Report to Congress were \$103.3 million. A recommendation may also result in other benefits that are not readily translated into a dollar savings amount, such as improvements in program efficiency and effectiveness that ensure the integrity of an agency program. The OIG publishes a list of unimplemented recommendations in our Semiannual Report to Congress, fulfilling the reporting requirement stated in Section 5(a)(3) of the IG Act of 1978, as amended. This list represents a cumulative tally of recommendations previously issued in our audit and program evaluation reports for which corrective actions have not yet been completed. Further, our semiannual report lends transparency to the recommendation resolution process.

Our audit and evaluation work provides recommendations for improvements to the EPA's program offices and regions. The benefits of our audits and evaluations are the improvements realized. To maintain emphasis on unimplemented recommendations—which sometimes remain unresolved years after the report is issued—and to encourage progress, we are developing a status report for open recommendations, in which we will highlight the effect of incomplete EPA

actions and the EPA operations and programs that are affected. To help organize and prioritize the EPA's open recommendations, this report will classify them based on their organizational or environmental scope; as of now, we have developed six categories for this purpose: Management and Operations; Water Issues; Environmental Contamination and Cleanup; Toxics, Chemical Safety and Pesticides; Air Quality; and Research and Laboratories.

We will show how the management actions being proposed by the EPA will or could facilitate the implementation of the recommendations, which will resolve the conditions we reported.

Finally, for each open recommendation, we plan to specify which of the following benefits will be realized once corrective actions are completed: (1) the improvement of human health and the environment, (2) the provision of more effective and efficient operations and (3) the reduction of costs.

The semiannual report dated March 31, 2017, showed the EPA had 43 open recommendations with past due completion dates and 56 with future dates. Of those, the number of days from report issuance for the open recommendations that are past due ranged from less than 1 year to 9 years.

In particular:

- 33 were more than 1 year old.
- 10 were under 1 year old.

## **Tracking and Resolving OIG Recommendations to the Agency**

Implementation of the OIG's recommendations is vital to the effectiveness and efficiency of agency programs and operations. The OIG shares this subcommittee's interest in the agency's accountability for acting upon the recommendations. Office of Management and Budget Circular A-123 specifically defines management's responsibility for internal control in federal agencies as follows:

Agency managers are responsible for taking timely and effective action to correct deficiencies identified by the variety of sources discussed in Section IV, Assessing Internal Control. Correcting deficiencies is an integral part of management accountability and must be considered a priority by the agency.

Before an OIG report is finalized, the OIG is required by GAGAS standards to obtain the views of the responsible agency official regarding the findings, conclusions and recommendations. If the agency agrees with our recommendations, it must provide intended corrective actions and estimated completion dates that will address the deficiencies identified in the OIG's report. The OIG project team assesses the agency's proposed corrective actions and determines if the proposed actions sufficiently meet the intent of OIG recommendations.

In most cases, the OIG and agency agree on report recommendations. When there are disagreements, we follow a specified dispute resolution process. If an agreement on a recommendation cannot be reached between the Assistant Inspector General and the EPA Action

Official, the issue is elevated to the EPA Chief Financial Officer and the IG for resolution. If there is still disagreement, the matter is then elevated to the Deputy Administrator (or in some cases the Administrator), who makes the final decision.

Once a final OIG report is issued, OIG staff tracks each recommendation until it is fully implemented. The OIG does not remove a recommendation based on a refusal to act or because time has passed. If the recommendation takes 3 or more years to complete and conditions change notably from when the OIG originally issued a recommendation (e.g., agency resources change, new legislation is implemented, a crisis occurs, etc.), circumstances may call for a reassessment of the recommendation and any actions the agency agreed to take.

### **Revisiting a Topic With Another Audit or Evaluation**

Promptly reaching agreement on actions to resolve OIG recommendations to the EPA and, subsequently, assessing progress on those agreed-to actions are integral to the OIG's contributions to effective management at the EPA. The OIG and the EPA Chief Financial Officer assess and report on the agency's progress in resolving OIG recommendations. Monitoring, reviewing and verifying the completion of corrective actions is an essential control for promoting economy, efficiency and effectiveness within the agency's operations. Having an effective post-resolution follow-up process encourages the agency to take needed actions to improve business practices and accountability and to enhance protection of public health and the environment.

The Assistant Inspectors General for our Offices of Audit and Program Evaluation annually select certain topics for follow-up audits. Assignments are based on the complexity and significance of the issues and recommendations in an original report. Generally, though, any recommendation included in a prior Semiannual Report to Congress will be considered for a follow-up audit.

As requested, I will now highlight a few examples of unimplemented recommendations that indicate significant management opportunities at the EPA.

### **Examples of OIG Recommendations Made to the EPA That Remain Unimplemented**

1. The OIG issued a report titled *Improved Management of the Brownfields Revolving Loan Fund (RLF) Program Is Required to Maximize Cleanups*, No. [17-P-0368](#), on August 23, 2017. We conducted this audit to determine whether recipients of Brownfields RLF are using program income to capitalize an RLF and to loan and grant money for Brownfields remediation after cooperative agreements are closed. The EPA's Office of Brownfields and Land Revitalization (OBLR), within the agency's Office of Land and Emergency Management, oversees this program. The OIG recommended that the EPA develop a policy to reduce balances of available program income within the Brownfields RLF being held by recipients. The policy should establish a timeframe for recipients to use or return the funds to the EPA. Potential cost savings amount to \$10.9 million. This recommendation is, as yet, unimplemented. However, OBLR has committed to working with the agency's regional offices to develop a policy regarding the monitoring of



accumulated program income in the cooperative agreements at certain points in the life of a cooperative agreement. The agency's planned completion date is March 31, 2018.

2. The OIG issued a report titled *EPA Lacks Processes to Validate Whether Contractors Receive Specialized Role-Based Training for Network and Data Protection*, No. [17-P-0344](#), on July 31, 2017. We conducted this audit to determine what processes the EPA uses to verify that agency contractors with significant information system security responsibilities meet established specialized training requirements. The EPA's Office of Environmental Information (OEI) oversees the agency's information security program. The OIG recommended that the EPA work with the Assistant Administrator for Administration and Resources Management to implement a process that requires appropriate agency personnel to maintain a listing of contractor personnel who have significant information security responsibilities and are required to take role-based training. This process should require appropriate agency personnel to validate and report to the Chief Information Security Officer that all relevant contractor personnel have completed role-based training. This recommendation is, as yet, unimplemented. To implement the process, OEI has committed to working work with the Contracting Officer's Representatives and the Office of Administration and Resources Management. OEI also said that it will require that the agency personnel attest to the Chief Information Security Officer, not the Senior Agency Information Security Officer, that all relevant contractor personnel have completed role-based training. The agency's planned completion date is December 31, 2018.

3. The OIG issued a report titled *Over \$774 Million of Puerto Rico State Revolving Funds at Risk*, No. [17-P-0186](#), on April 26, 2017. We conducted this audit to accomplish the following objectives: (1) identify the source of funds that make up the \$188 million in question; (2) determine the current status of the \$188 million and the potential for recovery; (3) identify causes for the alleged financial irregularities (other than the bank failure); (4) determine when the agencies responsible for administering the Puerto Rico revolving funds knew or should have known about the financial crisis and the bank's failure, and determine what actions or measures, if any, these agencies could have taken to secure the funds in question; and (5) determine if the EPA performed adequate oversight. The EPA's Office of Wastewater Management administers the Clean Water State Revolving Fund (CWSRF) program and the EPA's Office of Ground Water and Drinking Water administers the Drinking Water State Revolving Fund (DWSRF) program; both of these offices are in the EPA's Office of Water (OW). EPA Region 2's Caribbean Environmental Protection Division provides oversight of both the CWSRF and DWSRF in Puerto Rico. The OIG recommended that the EPA evaluate options to restore the viability of Puerto Rico's CWSRF and DWSRF or implement new strategies better suited to the financial, programmatic, public health and environmental needs of the government of Puerto Rico. Potential cost savings amount to \$774 million. This recommendation is, as yet, unimplemented. After a number of interim actions scheduled to take effect between June 2017 and September 2018, Region 2 has committed to considering future approaches to grant funding—including, but not limited to, future federal fund allocations—and to assessing the effectiveness and potential of transitioning

the program to a direct grant program. The agency's planned completion date is September 30, 2018.

4. The OIG issued a report titled *Cloud Oversight Resulted in Unsubstantiated and Missed Opportunities for Savings, Unused and Undelivered Services, and Incomplete Policies*, No. [14-P-0332](#), on August 15, 2014. We sought to determine whether the EPA had performed the following two actions: (1) implemented its cloud initiatives in accordance with the Federal Cloud Computing Strategy and associated requirements and (2) developed formal processes to monitor cloud vendors. Two EPA offices—OEI and OARM—have key responsibilities regarding the EPA's migration to the cloud. The OIG recommended that prior to entering into any future Infrastructure-as-a-Service contracts, the EPA perform a formal documented analysis to determine whether such contracts are in the EPA's best interest. The analysis should include the investments the EPA would have to make to address the integration requirements, obstacles and gaps identified as a result of the current Infrastructure-as-a-Service contract. This recommendation is, as yet, unimplemented. OEI agrees with the OIG's recommendation and is preparing an action plan accordingly. The agency committed to developing a plan to address three key aspects of our preparation for future Infrastructure-as-a-Service contracts. First, the agency said it would refine and communicate EPA's Cloud Computing Strategy. Second, the agency will design a Concept of Operations for OEI's National Computer Center to become the agency's Cloud Service Broker and undertake the necessary transformative activities. Third, OEI/Office of Technical Operations and Planning will define an agencywide approach for acquiring new Infrastructure-as-a-Service contracts. This

approach will incorporate a repeatable methodology that allows the EPA to identify any needed investments to address integration requirements, obstacles and gaps so that the agency will adhere to applicable federal cloud or information technology requirements. The agency's planned completion date is October 16, 2017.

5. The OIG issued a report titled *EPA Did Not Conduct Thorough Biennial User Fee Reviews*, No. [14-P-0129](#), on March 4, 2014. We performed this audit to evaluate the EPA's biennial user fee reviews. The objectives of our audit were to determine whether the EPA (1) conducts biennial reviews of the EPA's user fees and royalties programs, and (2) reviews all agency programs to determine whether fees should be assessed for the services they provide. The Office of Financial Management within the Office of the Chief Financial Officer (OCFO) and the Office of Wastewater Management within OW have primary jurisdiction over the audit issues. The OIG recommended that the EPA apply the federal user fee policy in determining whether to (a) charge fees for issuing federal National Pollutant Discharge Elimination System permits in which the EPA is the permitting authority or (b) request an exception from the Office of Management and Budget to charging fees. Potential cost savings amount to \$17.8 million. This recommendation is, as yet, unimplemented. This recommendation due date was revised to October 1, 2017, to allow the OW to continue working with OCFO to request an exception from a National Pollutant Discharge Elimination System user fee. The agency's planned completion date was December 31, 2014.

6. The OIG issued a report titled *Making Better Use of Stringfellow Superfund Special Accounts*, No. [08-P-0196](#), on July 9, 2008. The OIG conducted this audit to evaluate (1) the EPA regions' utilization of special account funds for Superfund accounts with high available balances, and (2) the EPA regions' utilization of special account funds for Superfund accounts that are at least 10 years old. Region 9 (the Pacific Southwest) manages several Superfund special accounts. The OIG recommended that the agency reclassify or transfer to the Superfund Trust Fund, as appropriate, \$27.8 million (plus any earned interest less oversight costs) of the Stringfellow special accounts in annual reviews, and at other milestones including the end of Fiscal Year 2010, when the record of decision is signed and the final settlement is achieved. Potential cost savings amount to \$27.8 million. This recommendation is, as yet, unimplemented. In 2012, a new area of groundwater contamination was identified that is commingling with—and will directly impact the cleanup of—existing Stringfellow contamination, requiring further investigations. Due to the additional investigations at the site, the anticipated date to complete the sitewide record of decision became December 31, 2015. In July 2016, Region 9 issued a memo to the IG, notifying us that the estimated completion date was further extended to September 30, 2023, due to additional work that the state has committed to complete in support of the final record of decision. The agency's planned completion date was December 31, 2012.
  
7. The OIG issued a report titled *Nutrient Pollution: EPA Needs to Work with States to Develop Strategies for Monitoring the Impact of State Activities on the Gulf of Mexico Hypoxic Zone*, No. [14-P-0348](#), on September 03, 2014. The OIG conducted this audit to

determine the steps that the EPA and states in the Mississippi River Watershed were taking to reduce nutrients that contribute to the Gulf of Mexico hypoxic zone. The EPA's OW is responsible for implementing the Clean Water Act (CWA). The OIG recommended that the EPA work with the state and federal task force members in the Mississippi River Watershed to develop and enhance monitoring and assessment systems that will track the environmental results of state nutrient reduction activities, including their contribution to reducing the size of the Gulf of Mexico hypoxic zone. This recommendation is, as yet, unimplemented. The EPA says the Nonpoint Source Measure Workgroup has continued to make progress assessing available and achievable common measures that all states participating in the Hypoxia Task Force can use to track progress. In addition, the EPA has assembled information on the conservation practices funded by the agency's 319 grant program for states and territories, while states have compiled data on state-funded practices. The U.S. Department of Agriculture's National Resource Conservation service is also expected to release a national data sharing policy that describes a process for states to access U.S. Department of Agriculture conservation practice implementation information. As a result, the Nonpoint Source Measure Workgroup expects that a Nonpoint Source Measures Report can be completed this calendar year. The task force will also continue its work to collect information on privately funded conservation investments. A revised expected completion date is still under review. The Hypoxia Task Force continues to work on its first nonpoint source measures report and anticipates issuing a first report describing progress to date by June 1, 2017. However, the corrective action is still not complete. The agency's initial planned completion date was June 30, 2015.

8. The OIG issued a report titled *EPA Needs to Further Improve How It Manages Its Oil Pollution Prevention Program*, No. [12-P-0253](#), on February 6, 2012. The OIG performed this evaluation in response to a request from the House Committee on Transportation and Infrastructure. We addressed the following two questions: (1) What steps has the EPA taken to ensure the quality and consistency of Spill Prevention, Control, and Countermeasure Plans (otherwise known as SPCC Plans) and Facility Response Plans (otherwise known as FRPs)? and (2) How does the EPA track CWA Section 311 violations and violators in order to manage its oil pollution program? The EPA's Office of Land and Emergency Management oversees the program. The OIG recommended that the agency improve oversight of facilities regulated by the EPA's oil pollution prevention program by producing a biennial public assessment of the quality and consistency of SPCC Plans and FRPs based on inspected facilities. For corrective action, the agency said that it would develop a summary of assessment findings concerning SPCC plans. These findings would help to identify areas where additional guidance and outreach are needed to improve the quality and consistency of SPCC Plans. The planned completion date was October 31, 2013. The agency said that it would use the model developed for the SPCC program to develop a review protocol for FRPs by September 30, 2013, to examine FRP inspections conducted during the FY 2013 inspection cycle. The agency said that it would develop a summary of findings from these FY 2013 inspections by October 31, 2014. These findings would help to identify areas where additional guidance and external outreach are needed to improve the quality and consistency of FRPs. These recommendations are, as yet, unimplemented. The agency revised this milestone date to June 30, 2020.

9. The OIG issued a report titled *EPA Needs a Risk-Based Strategy to Assure Continued Effectiveness of Hospital-Level Disinfectants*, No. [16-P-0316](#), on September 19, 2016. We conducted this review of the EPA's Antimicrobial Testing Program to (1) determine whether the program ensures the efficacy of EPA-registered hospital sterilants, disinfectants and tuberculocides and (2) evaluate options for improving the program. The EPA's Office of Chemical Safety and Pollution Prevention has primary responsibility for the efficacy testing of antimicrobial pesticides. The OIG recommended that the agency suspend administering the current Antimicrobial Testing Program until completion of the one-time re-registration process. The agency's planned completion date for this recommendation is November 30, 2017. The OIG also recommended that the agency develop a risk-based antimicrobial testing strategy to assure the effectiveness of public health pesticides used in hospital settings. At a minimum, the strategy should (a) include a framework for periodic testing to assure products continue to be effective after resignation, (b) define a program scope that is flexible and responsive to current and relevant public health risks, (c) identify risk factors for selecting products to test, (d) identify the method to be used for obtaining samples for testing and (e) designate a date to commence risk-based post-registration testing. The agency's planned completion date for this recommendation is November 30, 2018. Both recommendations are, as yet, unimplemented.
10. The OIG issued a report titled *Management Alert: Drinking Water Contamination in Flint, Michigan, Demonstrates a Need to Clarify EPA Authority to Issue Emergency Orders to Protect the Public*, No. [17-P-0004](#), on October 20, 2016. The OIG is



conducting an ongoing review to examine the circumstances of, and the EPA's response to, the contamination in the city of Flint, Michigan's, community water system, including the EPA's exercise of its oversight authority. The purpose of our issuing this initial report was to expeditiously alert the EPA of key factors that delayed its intervention in Flint using its emergency authority granted under the Safe Drinking Water Act (SDWA) in Section 1431. When our review is complete, we plan to issue a subsequent report. In this initial report, the OIG recommended that the agency update its *Final Guidance on Emergency Authority under Section 1431 of the SDWA (1991)* to clarify how and when it should intervene in emergency situations. Specifically, we recommended that the agency should (1) include the most relevant examples of SDWA Act Section 1431 orders nationwide and examples of state actions that would be considered timely and protective, (2) reflect the current delegations of authority to both the Regional Administrators and the Assistant Administrator for Enforcement and Compliance Assurance and (3) establish checklists for when both the Regional Administrators and the Assistant Administrator for Enforcement and Compliance Assurance should consider emergency action under the SDWA Section 1431. The agency's planned completion date for this recommendation is November 30, 2017. The OIG also recommended that the agency train, in cooperation with the Assistant Administrator for Water, all relevant EPA drinking water and water enforcement program management and staff on the Section 1431 authority and updated guidance. The agency's planned completion date for this recommendation is November 30, 2017. Both recommendations are, as yet, unimplemented.

## **Conclusion**

I commend the subcommittee's interest in our work and ensuring that EPA management take the necessary steps to address recommendations that the OIG and the agency have agreed will remediate identified problems. The support of Congress is absolutely essential in our ability to work with the EPA to address these recommendations. We will continue to work actively with the EPA and to keep Congress fully advised on the status of our recommendations.

Accomplishing the tasks that we have discussed at this hearing requires sufficient appropriated funds from Congress. The EPA OIG returned \$22 for every dollar given to us in FY 2016. When the OIG is unable to carry out its responsibilities because of inadequate funding, it is a net loss to the federal government and the American taxpayers. While I am aware this is not an appropriations subcommittee, I respectfully ask for any help you can provide us in this regard.

Chairman Murphy, Ranking Member DeGette and members of the subcommittee, this concludes my prepared statement. I would be happy to answer any questions that you or the subcommittee members may have.

## **One-Page Summary of the EPA OIG's Written Testimony**

***Impact of OIG Recommendations:*** Making recommendations is a critical role for every OIG in carrying out our oversight mandate. Recommendations can greatly benefit agency programs—but only when an agency chooses to implement them or if Congress chooses to take legislative action or other measures to address them. The impact of an OIG recommendation may be cost savings or an improvement in program efficiency and/or effectiveness.

***Background:*** The IG Act of 1978 provides for OIGs to conduct independent reviews of agency programs and operations. The EPA OIG's recommendations are developed in accordance with generally accepted government auditing standards and are issued as part of a final report. The OIG publishes summaries of unimplemented recommendations in our Semiannual Report to Congress, as required by Section 5(a)(3) of the IG Act of 1978, as amended. This list lends transparency to the recommendation resolution process.

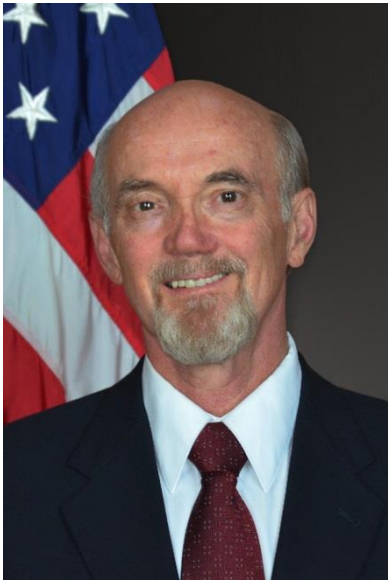
***Number of Unimplemented Recommendations:*** The average number of recommendations unimplemented by the EPA as reported in each of the semiannual reporting periods between March 2013 and March 2017 was 48. The OIG's most recent semiannual report, covering October 1, 2016, through March 31, 2017, cited 43 unimplemented recommendations. Of those, the number of days from report issuance to the date of the semiannual report ranged from less than 1 year to 9 years. Thirty-three were more than 1 year old and 10 were under 1 year old.

***Tracking Recommendations:*** In most cases, the OIG and agency agree on report recommendations. When there are disagreements, we follow a specified dispute resolution process. If an agreement on a recommendation cannot be reached between the Assistant Inspector General and the EPA Action Official, the issue is elevated to the EPA Chief Financial Officer and the IG for resolution. If there is still disagreement, the matter is then elevated to the Deputy Administrator (or in some cases the Administrator), who makes the final decision.

***The following reports have unimplemented recommendations that indicate significant management opportunities at the EPA:*** (1) *Improved Management of the Brownfields Revolving Loan Fund Program Is Required to Maximize Cleanups*; (2) *EPA Lacks Processes to Validate Whether Contractors Receive Specialized Role-Based Training for Network and Data Protection*; (3) *Over \$774 Million of Puerto Rico State Revolving Funds at Risk*; (4) *Cloud Oversight Resulted in Unsubstantiated and Missed Opportunities for Savings, Unused and Undelivered Services, and Incomplete Policies*; (5) *EPA Did Not Conduct Thorough Biennial User Fee Reviews*; (6) *Making Better Use of Stringfellow Superfund Special Accounts*; (7) *Nutrient Pollution: EPA Needs to Work with States to Develop Strategies for Monitoring the Impact of State Activities on the Gulf of Mexico Hypoxic Zone*; (8) *EPA Needs to Further Improve How It Manages Its Oil Pollution Prevention Program*; (9) *EPA Needs a Risk-Based Strategy to Assure Continued Effectiveness of Hospital-Level Disinfectants*; and (10) *Management Alert: Drinking Water Contamination in Flint, Michigan, Demonstrates a Need to Clarify EPA Authority to Issue Emergency Orders to Protect the Public*. These reports are described in detail in the written testimony.



## **Biography of Counsel to the Inspector General Alan S. Larsen**



Alan S. Larsen became Counsel to the Inspector General of the U.S. Environmental Protection Agency (EPA) in August of 2012. In 2013 he took on the additional role of Assistant Inspector General for Congressional and Public Affairs, and currently holds both positions. Before his appointment, Mr. Larsen served as Counsel to the Inspector General for the National Reconnaissance Office, and before that, Deputy Counsel and then acting Counsel to the Inspector General at the Central Intelligence Agency.

Previously, Mr. Larsen was Senior Vice President and Deputy General Counsel for a wind energy development company, doing domestic and international projects. Prior to that, he was a partner in private law practice, in Portland, Oregon, later becoming Managing Partner of the firm's Washington, D.C., office.

Mr. Larsen earned a Bachelor of Science in Business Administration from Bucknell University. He earned his Juris Doctor degree from Northwestern

School of Law of the Lewis & Clark College.

He is a member of the bar of the state of Oregon and the District of Columbia, and multiple U.S. District Courts and Circuit Courts of Appeal.

Mr. Larsen is the recipient of the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Leadership Award, CIGIE awards for Excellence in Law and Legislation, and Excellence in Investigations, and the Intelligence Community Inspector General Leadership Award. He was United States Delegate to International Intelligence Review Agencies in 2002, 2004 and 2006.